

June 26, 2015

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Sent via email to Julie.Saare-Edmonds@water.ca.gov

Subject: Comments on Update to State Model Water Efficient Landscape Ordinance (MWELo)

Dear Ms. Saare-Edmonds:

Thank you for the opportunity to comment on the 2015 update of MWELo. I was involved in the crafting of the original document in 1991 and have continued to write and speak about landscape water conservation to horticulturists and arborists throughout the U.S. and Australia. It's wonderful to see communities throughout California incorporate the MWELo framework into their water conservation efforts. In fact, I've seen the influence of MEWLO in regulations and policies in several places around the world.

I would like to offer comments on two specific components of the 2015 update: including existing mature trees in the definition of Special Landscape Area (SLA), and increasing the Maximum Applied Water Allowance (MAWA) for landscapes irrigated with recycled water.

1. Include existing mature trees in the definition of Special Landscape Area.

California's urban forest provides many environmental, aesthetic, economical, psychological, and social benefits to its citizens. Mature trees and landscapes contribute to the value of California's urban forest. When properties are developed and landscapes are rehabilitated, mature trees often are retained on the site. In fact, almost all communities in California require retention of healthy mature trees on development sites.

Our urban forest is composed of a variety of tree species ranging from high water demand species to drought tolerant species. Many of the urban forest's mature trees have been irrigated throughout their life and require regular irrigation to maintain good health. Examples are magnolia and redwood, which are significant components of the urban forest in the San Francisco Bay Area. If we are to retain mature trees that are already established in the landscape we must meet their water requirements. I think that if such trees are included in the MAWA of 40% ETo, they will not receive adequate water and will decline and die, causing a significant loss to property owners and the public. For this reason I recommend including mature trees that are retained in new and refurbished landscapes as SLAs, with a MAWA of 100% ETo.

2. Increase the Maximum Applied Water Allowance for landscapes irrigated with recycled water.

Landscapes irrigated with recycled water are included in the SLA definition, and assigned a MAWA of 100%. Recycled water is an important resource for sustaining our landscapes, one which I encourage the green industry to embrace. The quality of recycled water available for landscape irrigation, however, varies significantly. Recycled water that contains elevated concentrations of salts, chloride, sodium, and boron, can damage salt sensitive plants. Over

a period of time, salts in the water accumulate in the soil and are taken up by the plants. If critical concentrations are reached, plants are damaged.

The main management tools available to keep salts below damaging levels is to irrigate heavily to leach the salts below the plant root zone, and to keep soils moist so that salts are less concentrated. In some cases it may be necessary to apply greater than 100% ET to accomplish adequate leaching and to avoid landscape damage. For this reason I recommend increasing the MAWA for landscapes irrigated with recycled water to 120% ET.

I am happy to provide more information regarding my comments if that is of interest. Please feel free to contact me at nelda@hortscience.com.



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